

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF VIRGINIA
EASTERN DIVISION

UNITED STATES OF AMERICA

CASE NO. 1:11-cr-00084-LMB
vs.

DESIREE BROWN,

DEFENDANT'S MOTION FOR EXTENSION OF SELF SURRENDER DATE

COMES NOW the Defendant, DESIREE BROWN, by and through her undersigned attorney, files her Motion for an extension relating to the designation date of July 21, 2011 relating to her self-surrender at the designated facility, FCI COLEMAN MEDIUM, and would show unto this Honorable Court the basis for same, to wit:

1. That the Defendant is in the process of timely liquidating some personal property: motor vehicles, etc., and addressing outstanding federal tax matters, in addition to other personal responsibilities.

2. That the issue still remains as to the Defendant's "restitution" and she would like to have the opportunity to address same with her attorney in a timely fashion.¹

¹ The government requested and counsel agreed, at the time of sentencing, that there would be a bifurcation and that restitution would be addressed separately at a later date. As of this time, the matter has not been addressed.

3. It is anticipated that a thirty day extension establishing a voluntary self-surrender date after August 30, 2011 would be sufficient to address all of the issues, referenced, herein.

4. That Assistant United States Attorney, Patrick Stokes, has authorized the undersigned to represent to the Court that there is no objection to the request for extension.

WHEREFORE, it is respectfully requested that the Court enter an Order allowing the Defendant, DESIREE BROWN, an extension of her self-surrender date of July 21, 2011 at FCI COLEMAN MEDIUM, COLEMAN, FL, until sometime after August 31, 2011, along with any other relief that the Court deems meet and proper.

RESPECTFULLY SUBMITTED this 11th day of July, 2011.
THOMAS D. HUGHES, IV, ESQUIRE JACK R. MARO, ESQUIRE
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/s/ Thomas D. Hughes, IV /s/ Jack R. Maro

THOMAS D. HUGHES, IV, ESQUIRE JACK R. MARO, ESQUIRE

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by electronic filing this 11th day of July, 2011, to: PATRICK STOKES, AUSA.

/s/ Thomas D. Hughes, IV

THOMAS D. HUGHES, IV.

